## UNITED STATES BANKRUPTCY COURT

**District of New Jersey** 

Caption in Compliance with D.N.J. LBR 9004-1(b)

Robert J. Feinstein, Esq. (admitted pro hac vice)

Bradford J. Sandler, Esq.

Paul J. Labov, Esq.

Colin R. Robinson, Esq.

PACHULSKI STANG ZIEHL & JONES LLP

780 Third Avenue, 34th Floor

New York, NY 10017

Telephone: (212) 561-7700

Facsimile: (212) 561-7777
rfeinstein@pszjlaw.com

bsandler@pszjlaw.com plabov@pszjlaw.com

crobinson@pszjlaw.com

Counsel to the Plan Administrator

In re:

BED BATH & BEYOND INC., et al., 1

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

(Jointly Administered)

## APPLICATION FOR ORDER SHORTENING TIME

I, Colin R. Robinson, an attorney for Michael Goldberg, Plan Administrator, requests that the time periods for the hearing and response deadlines on the Plan Administrator's (i) *Motion for Entry of an Order Pursuant to Fed. R. Bankr. P. 9019 (I) Approving Settlement Resolving Dispute Over Disposition of Collateral Backing Obligations to Safety National Casualty Corporation; (II) Resolving, In Part, Safety Proofs of Claim Nos. 10483 & 18738; and (III) Granting Related Relief* (the "Settlement Motion") and (ii) *Motion for Order Authorizing Plan Administrator to File Under Seal* the Settlement Motion as required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P 9006(c)(1), for the reasons set forth below:

1. A shortened time hearing is requested because: If the settlement is not approved before April 15, 2024, the parties will be required to revise the proposed settlement to account for the draw on certain letters of credit.

<sup>&</sup>lt;sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtor's proposed claims and noticing agent at https://restructuring.ra.kroll.com/bbby.

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- 2. State the hearing dates requested: April 12, 2024 at 10:00 a.m.
- 3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

Confirmed.

The applicant requests entry of the proposed order shortening time.

Date: April 2, 2024 /s/ Colin R. Robinson

Signature